

**PLAINTIFF'S MOTION  
EXHIBIT 18**

1 T. Caughey

2 your possession?

3 MR. SHAFFER: Objection.

4 A. When I retired, I never went to the  
5 property clerk to get my guns.

6 Q. Why not?

7 MR. SHAFFER: Objection.

8 A. No reason.

9 Q. Do you carry a gun today at all?

10 MR. SHAFFER: Objection.

11 A. No.

12 Q. Do you have a good guy letter?

13 MR. SHAFFER: Objection.

14 A. Yes.

15 Q. Do you remember encountering  
16 Officer Schoolcraft on October 31, 2009?

17 A. Yes.

18 Q. What do you recall about that?

19 A. I recall Officer Schoolcraft was  
20 sitting at the telephone switchboard. I was  
21 walking by with a couple of command logs  
22 which are 20 inches tall by 11 inches wide.  
23 They are very heavy. I had a few of them  
24 along with a couple of other logs. I saw  
25 Officer Schoolcraft making an entry in his

1 T. Caughey

2 memo book. I said, Is it up to date? I put  
3 it on top. I will sign it. I put into the  
4 top of the things I was signing. I went into  
5 the office or administrator room with it.

6 Q. How long did you keep it, his memo  
7 book?

8 A. I don't know.

9 Q. What did yo do with the memo book?

10 A. I had it in my office. And after I  
11 finished my administrator, the paperwork I  
12 was doing, I then opened his book and  
13 signed -- I believe I signed it.

14 Q. And what did you do next?

15 A. Then made copies of his memo book.

16 Q. Of the whole book or just  
17 particular pages?

18 A. I believe I made copy of the whole  
19 book.

20 Q. How many pages was that?

21 MR. SHAFFER: Objection.

22 A. I don't know how many pages it is.

23 Q. More than ten?

24 A. More than ten.

25 Q. Would you take a look at what has

1 T. Caughey

2 been marked as Exhibit 45, first page of  
3 which appears to be a cover page for Officer  
4 Schoolcraft's memo book dated August 11,  
5 2009.

6 Can you tell me after looking at  
7 this exhibit whether or not these were the  
8 pages that you photocopied on October 31st?

9 A. I cannot say these are the pages  
10 that I copied that day.

11 Q. Why did you photocopy pages or the  
12 whole memo book?

13 A. As I was signing Schoolcraft's memo  
14 book I noticed on one of the back pages,  
15 which was referred to earlier as a fly page,  
16 what I thought to be an unusual entry.

17 Q. What was the unusual entry?

18 A. If I recall correctly, it was an  
19 entry about a Sergeant Gallina and a Sergeant  
20 Sawyer having an argument at roll call.

21 Q. And as a result of seeing that  
22 entry, you decided to make a photocopy of the  
23 entire memo book?

24 A. There was another entry in there,  
25 but I don't recall what it was about. But,

1 T. Caughey

2 Schoolcraft's memo book?

3 A. No.

4 Q. 8641 there are references to a  
5 meeting between Schoolcraft and Lieutenant  
6 Brill.

7 Were you aware of those references  
8 in Officer Schoolcraft's memo book when you  
9 made a photocopy?

10 A. I was not.

11 Q. As of October 31, 2009 were you  
12 aware that Officer Schoolcraft was discussing  
13 any matters with Lieutenant Brill?

14 MR. SHAFFER: Objection.

15 A. No.

16 Q. As of October 31st, at the time you  
17 took Officer Schoolcraft's memo book did you  
18 know that Officer Schoolcraft had contacted  
19 IAB?

20 A. No.

21 Q. As of October 31st, did you know  
22 that Officer Schoolcraft contacted QAD?

23 A. No.

24 Q. Why did you make the photocopy of  
25 Officer Schoolcraft's memo book?

1 T. Caughey

2 MR. SHAFFER: Objection.

3 A. For the unusual entry that he made  
4 in it.

5 Q. What did you do with that  
6 photocopy?

7 A. I placed a copy -- I made two  
8 copies of the memo book. I believe I put one  
9 in my office and I put another copy into the  
10 inspector's office.

11 Q. When you say you put another copy  
12 in the inspector's office, what do you mean?

13 A. I went into his office with the  
14 copies in a manila envelope. I put it in his  
15 drawer of his desk.

16 Q. Did you write a note in the manila  
17 envelope or on the manila envelope?

18 A. No.

19 Q. Did Mauriello know you were making  
20 copies of the memo book at the time you were  
21 making them?

22 A. No.

23 Q. Did you tell Inspector Mauriello  
24 after making the copies that you made copies  
25 and put a copy in his desk drawer?